

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE: DEALER MANAGEMENT SYSTEMS
ANTITRUST LITIGATION

MDL No. 2817
Case No. 18 C 864

This Document Relates to All Cases

Hon. Robert M. Dow, Jr.
Magistrate Judge Jeffrey T. Gilbert

**DECLARATION OF MICHAEL N. NEMELKA IN SUPPORT OF
MDL PLAINTIFFS' OPPOSITION TO
DEFENDANT REYNOLDS'S MOTION FOR PARTIAL RECONSIDERATION OF
[DKT. 441] ORDER ON MDL PLAINTIFFS' OMNIBUS MOTION TO COMPEL**

I, Michael N. Nemelka, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am a partner with the law firm of Kellogg, Hansen, Todd, Figel & Frederick, P.L.L.C. in Washington, D.C., which is MDL Co-Lead Counsel and Interim Class Counsel for the Vendor Class in the above captioned case. I respectfully submit this declaration in support of MDL Plaintiffs' Opposition to Defendant The Reynolds and Reynolds Company's Motion for Partial Reconsideration of [Dkt. 441] Order on MDL Plaintiffs' Omnibus Motion to Compel.
2. Attached as **Exhibit A** is a true and correct copy of the document Bates-stamped CDK-0801743.
3. Attached as **Exhibit B** is a true and correct copy of the document Bates-stamped REYMDL00064849.
4. Attached as **Exhibit C** is a true and correct copy of a compilation of documents Bates-stamped: CDK-0223000; CDK-0222931; CDK-1227486; CDK-0222846; and CDK- 2699033.
5. Attached as **Exhibit D** is a true and correct copy of excerpts from the rough transcript for the deposition of Ron Workman (December 7, 2018).
6. Attached as **Exhibit E** is a true and correct copy of Plaintiffs' Exhibit 446 to the deposition of Ron Workman (Bates-stamped CDK-2053727).

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: December 12, 2018

/s/ *Michael N. Nemelka*

Michael N. Nemelka